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October 18, 2022

Hon. Brian M. Cogan
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn New York, 11201

**Re: Request for extension
Case No. 1:21-cv-06363-BMC-VMS**

Dear Judge Cogan,

I am writing to request a two-month extension on the discovery order for the above-referenced matter.

As an initial matter, I am not the originating attorney on this case. My Client, Mr. Kliti, retained counsel prior to retaining my firm. Upon his termination of counsel, Mr. Kliti needed additional time to retain counsel.

By way of background, we filed a notice of appearance on September 13, 2022 and attended a status conference on September 15, 2022 with Judge Vera M. Scanlon. We are trying to comply with the discovery order issued by this Court requiring the parties to exchange written discovery by 9/30/2022 and to take depositions on or before October 28, 2022. We have complied with the written discovery deadlines by propounding our discovery requests on September 30, 2022; however, we do not yet have a response to our interrogatories, nor do we have a response to our request for production of documents from opposing counsel. As such, we are unable to adequately prepare for, conduct, or defend depositions.

Accordingly, as stated above, a two-month extension on all dates listed in the discovery order should be sufficient time to properly complete discovery. We have contacted opposing counsel and they consent to the above stated extension. Thank you for your time and attention in consideration of this matter.

Respectfully Submitted,

By: /s/ Jordan El-Hag
Jordan El-Hag, Esq.